

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,	*	
Plaintiff,	*	
	*	
V.	*	CRIM. NO. 19-355 (FAB)
	*	
FREDDY RAMOS ORTIZ,	*	
Defendant.	*	
	*	

**MOTION FOR EXTENSION OF TIME
TO FILE CHANGE OF PLEA MOTION**

TO THE HONORABLE FRANCISCO A. BESOSA,
JUDGE OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO.

Mr. Ramos Ortiz respectfully requests an extension of time to file his motion for change of plea.

1. Counsel for the parties spoke this week about the government's outstanding plea offer and other alternatives.

2. Yesterday, an alternative solution was discussed by counsel for the parties, which was communicated today to Mr. Ramos Ortiz in person.¹

3. Counsel for the government requested that a counteroffer including this alternative be fashioned in order to request authorization.

¹ It should be noted that counsel has only received her first does of the Covid-19 vaccine as of January 24, 2021, reason why contact with the client had been only by telephone and through legal correspondence up to this point. Notwithstanding, counsel visited Mr. Ramos Ortiz in person at MDC Guaynabo today.

4. After discussing the alternative with Mr. Ramos Ortiz and receiving his authorization to extend a counteroffer, more time is needed for Mr. Alum to consider our counteroffer, hold any necessary discussions with his supervisors and communicate with counsel. Obviously, if the counteroffer is not accepted but an alternative offer extended, counsel will need to go back to MDC Guaynabo to discuss it matters with the defendant.

5. An extension until the end of February is requested to complete the above described process.

WHEREFORE it is respectfully requested that an extension of time be granted until February 28, 2021 to file the motion for change of plea.

RESPECTFULLY REQUESTED.

In San Juan, Puerto Rico this 5th day of February 2021.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this MOTION was filed through the CM/ECF system providing notice to the U.S. Attorneys Office and the Probation Office.

In San Juan, Puerto Rico this 5th day of February, 2021.

S/ Laura Maldonado Rodriguez
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